

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re:

RESIDENTIAL CAPITAL, LLC., et al.

Debtors

Case No. 12-12020 (MG)

Chapter 11

Jointly Administered

**MOTION FOR CONTINUANCE OF HEARING
REGARDING DEBTORS' OBJECTIONS TO THE ESTATE'S PROOF OF CLAIM**

COMES NOW Karen Mitchell-Smith, appearing pro se on behalf of the Estate of Felecia V. Mitchell ("Estate"), Creditor, and respectfully MOVES this Court for a Continuance of the Hearing on Debtors' Objections to Estate's Claim in the above-captioned Case until at least **November 23, 2013**. Originally, there was a Hearing on this matter scheduled for November 7, 2013, but, by means of a Notice of Change of Omnibus Hearing Date (copy attached), this date was changed, unilaterally and for reasons unknown, to November 15, 2013. This Court and all relevant Parties have previously been informed, by means of the Estate's Motion dated September 21, 2013 (copy attached), that Ms. Mitchell-Smith, due to her ongoing cancer treatments, would be unable to attend any Hearing on that date or any other during the period of November 9-23, 2013. The reasons for her need for a Continuance are further developed below:

1. Ms. Mitchell-Smith is a 70 year-old woman. She currently resides in Hampton, Georgia. Ms. Mitchell-Smith has been appointed Acting Administratrix for the Estate of her mother, Felecia V. Mitchell. The Estate has filed a Proof of Claim against GMAC Mortgage, LLC.

2. While preparing for the original November 7, 2013 Hearing date, Ms. Mitchell-Smith's son, John Vogel, discovered on November 6, 2013 that this Hearing, unilaterally and for reasons unknown, was postponed until November 15, 2013. This information had been buried deeply within the Notice. This change in Hearing Date was confirmed by the Clerk's Office. A copy of the Notice of Change of Omnibus Hearing Date is attached for the Court's convenience.
3. By means of the Estate's Motion dated September 21, 2013, this Honorable Court and all relevant Parties previously had been informed that Ms. Mitchell-Smith, due to her ongoing cancer treatments, would be unable to attend any Hearing on that date or any other during the period of November 9-23, 2013. For this reason, the Hearing was originally scheduled for November 7, 2013. A copy of the Estate's Motion is also attached for the Court's Convenience.
4. Unfortunately, the rescheduled Hearing date of November 15, 2013 falls in the midst of one of Ms. Mitchell-Smith's periodic treatments for her Skin Cancer. The current series is anticipated to last from November 9-23, 2013. As such, she will be unable to attend any Hearing on November 15, 2013.
5. Since the time of her appointment, Ms. Mitchell-Smith has been diagnosed with Stage 3 to Stage 4 Skin Cancer. Over the better part of a year, she has been undergoing treatment for this cancer. This treatment requires her to undergo procedures periodically.

Her doctors have proposed several treatment options including surgery, chemotherapy, and radiation.

6. In the event that her health does not respond adequately to these treatments, Ms. Mitchell-Smith may have to resign her appointment as Administratrix of the Estate.

WHEREFORE, in light of her current cancer treatments and the fact that this Court has previously been informed of her unavailability for the date, Karen Mitchell-Smith, appearing pro se on behalf of the Estate of Felecia V. Mitchell, does hereby respectfully MOVE this honorable Court for a Continuance of this Hearing until sometime after November 23, 2013.

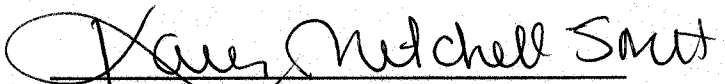
Moreover, due to her ongoing cancer treatments, Ms. Mitchell-Smith will be unable to appear pro se in New York City on behalf of the Estate on the following dates as well:

November 9, 2013 thru November 23, 2013 (inclusive)

December 9, 2013 thru December 13, 2013 (inclusive)

Any other Hearing dates should be acceptable.

Respectfully submitted,



KAREN MITCHELL-SMITH

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703-568-8124

Administratrix Appearing Pro Se

Date: November 8, 2013